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MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY MEDICINE

FEDERAL COMMUNICATIONS
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)

)
Amendment of Part 97 of the)
Commission's Rules Governing the)
Amateur Radio Services to Expand)
the Privileges Available to)
Novice Class Licensees in)
the 222-225 MHz Band)

PR 92-259

RM-7868

COMMENTS FILED IN RESPONSE TO A PETITION FOR RULE MAKING

Submitted by:

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December 27, 1991

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extensively in the above radio services for personal, business, medical and emergency/public assistance that this commenter supports the League's Petition.

II.

COMMENTS

3. This Petition raises the all-important global issue of "Spectrum Efficiency" in Amateur Radio. In particular, it attempts to correct the spectrum inefficient policies adopted by the Commission in PR Docket 86-161 regarding Novice class radio operator privileges in the 222-225 MHz band.

4. By limiting operator voice privileges to the 222.10-223.910 MHz sub-band, the Commission prohibited Novices from conducting simplex communications on the +1.6 KHz output repeater frequencies. This prohibition promotes spectrum inefficient operations.

5. The League is absolutely correct in noting that,

Good amateur operating practice has always been, and remains, that simplex FM operation should always be used when possible as an alternative to repeater use, both as a courtesy to free up the repeater for other users, and, more practically, to keep it available for emergency communications.^{1/}

6. Currently, the only legal way for Novices to enter into conversation with Technician, or higher class, operators transmitting simplex on the repeater output frequencies is for them to transmit on the authorized input frequencies, activating the repeaters. By so doing, Novice operators unnecessarily interfere and/or prevent spectrum efficient simplex repeater output frequency reuse, for potentially hundreds of square miles, within the coverage area of the repeaters.

7. Ironically, ^{neither} the League nor I ^{was} ~~were~~ the first to address the issue of Amateur Radio spectrum efficiency at 220 MHz since the adoption of PR Docket 86-161. This honor goes to Richard S. Moseson (Moseson) in his Petition for Reconsideration to the Report and Order in PR Docket 86-161. In 1987, he argued that "exclusion of Novice operators above 223.91 MHz fosters confusion, inefficient spectrum use and the likelihood of unintentional rule violations."2/

8. The Commission however concluded just the opposite and believed that "it would be more confusing to authorize Novices frequencies that are primarily used by licensees for repeater output channels."3/ The Commission supported its view by stating that "the entire 1.25 meter band would be available to Novice operators by upgrading."4/

9. In the Report and Order to PR Docket 86-161, the Commission also authorized Novice use of the 1270-1295 MHz sub-band.⁵/ Pursuant to the League's band plan, frequencies within 1270-1276 MHz are for repeater input and 1282-1288 MHz are for repeater output. Since Novices are authorized the entire 1270-1295 MHz segment, simplex communications on the repeater output frequencies is allowed.

10. This being the case, it is difficult to understand the Commission's assertion that simplex operations on the repeater output frequencies would be "confusing" to Novices at 220 MHz but not confusing at 1.2 GHz. As far as this Commenter is concerned, simplex communications on repeater output frequencies is the same on any Amateur Radio band, be it 10 meter, 6 meter, 2 meter, 220 MHz, 440 MHz, 1.2 GHz, ~~et~~ cetera.

III.

CONCLUSION

11. It should be the duty and responsibility of all operators, from Novice to Amateur Extra, to practice spectrum efficiency in Amateur Radio. Regulations that prevent the efficient use of spectrum fosters bad operating practices and wasting of a limited valuable resource.

12. This Petition by the League, if adopted, would correct the spectrum inefficient policies adopted for the 220 MHz Amateur Radio band in the PR Docket 86-161. This Commenter therefore supports the League's Petition to expand Novice operating privileges to the entire 222-225 MHz band.

Respectfully submitted,

Michael C. Trahos
Dr. Michael. C. Trahos

MCT/mct

IV.

FOOTNOTES

- 1/ PETITION FOR RULE MAKING, RM-7868, The American Radio Relay League, Inc., November 12, 1991, Footnote 6, Page 8.
- 2/ MEMORANDUM OPINION AND ORDER, PR Docket 86-161, FCC 87-321, Paragraph 9.
- 3/ Ibid.
- 4/ Ibid.
- 5/ REPORT AND ORDER, PR Docket 86-161, FCC 87-36, Paragraph 14.

V.

CERTIFICATE OF SERVICE

I, Dr. Michael C. Trahos, do hereby certify that a copy of these Comments were sent by U.S. Mail to the parties listed below on the day and date first above written.

1. The American Radio Relay League, Inc.
225 Main Street
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2. Christopher D. Imlay, Esquire
BOOTH, FRERET & IMLAY
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Respectfully,


Dr. Michael C. Trahos